


**CRIMINAL COMPLAINT**  
(Electronically Submitted)

<b>United States District Court</b>	DISTRICT of ARIZONA
<b>United States of America</b> <b>v.</b> <b>Jose Miguel Romero</b> DOB: 1971; United States Citizen	DOCKET NO.  MAGISTRATE'S CASE NO. <div style="text-align: center; font-size: 1.2em; font-weight: bold;">21-04637MJ</div>
Complaint for violation of Title 18, United States Code, Section 554(a)	
<b>COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION:</b> <p>On or about September 19, 2021, in the District of Arizona, <b>Jose Miguel Romero</b> knowingly and fraudulently exported and sent from the United States, and attempted to export and send from the United States, any merchandise, article, or object contrary to any law or regulation of the United States, and received, concealed, bought, sold, and in any manner facilitated the transportation, concealment, and sale of such merchandise, article or object, that is: four (4) firearms [one (1) ZASTAVA ARMS M92PV 7.62X39MM; one (1) PIONEER ARMS CORP SPORTER AKM-47 7.62X39MM; one (1) ROMARM/CUGIR WASR-10 7.62X39MM; one (1) NORINCO 84S 5.56X45MM]; knowing the same to be intended for exportation contrary to any law or regulation of the United States, to wit: Title 50, United States Code, Section 4819; Title 15, Code of Federal Regulations, Part 736.2; Title 15, Code of Federal Regulations, Part 774; and Title 15, Code of Federal Regulations, Part 738; all in violation of Title 18, United States Code, Section 554(a).</p>	
<b>BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED:</b> <p>On September 19, 2021, <b>Jose Miguel Romero</b> attempted to exit the U.S. to Mexico via the DeConcini Port of Entry in Nogales, Arizona. Romero was the registered owner, driver, and sole occupant of a 2000 GMC Sierra (GMC). Based upon Romero's interaction with Customs and Border Protection (CBP) during primary inspection Romero was referred to secondary inspection. During secondary inspection CBP found concealed in the rear quarter panels of the GMC: four (4) firearms; four (4) firearm magazines; one (1) butt stock; and sixty (60) rounds of 7.62 x 39MM ammunition.</p> <p>Romero was provided an advisal of rights, waived his rights, and stated that: he knowingly attempted to export the firearms from the U.S. into Mexico for money; and he himself concealed the four (4) firearms found in the rear quarter panels of the GMC.</p> <p>The firearms that Romero attempted to smuggle into Mexico qualify as United States Commerce Control List items and therefore are prohibited by law for export from the United States into Mexico without a valid license. Romero did not have a license or any other lawful authority to export these items from the United States into Mexico.</p>	
MATERIAL WITNESSES IN RELATION TO THE CHARGE: N/A	
<b>DETENTION REQUESTED</b> Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge.  AUTHORIZED AUSA <i>Brandon Bolling</i>	<b>SIGNATURE OF COMPLAINANT</b> Digitally signed by RICARDO AMAYA <b>RICARDO AMAYA</b> Date: 2021.09.21 07:33:53 -07'00'  <b>OFFICIAL TITLE</b> HSI Special Agent Ricardo Amaya
Sworn by telephone <u>  x  </u>	
<b>SIGNATURE OF MAGISTRATE JUDGE<sup>1)</sup></b> <div style="text-align: center; font-size: 1.2em; font-family: cursive;">  </div>	<b>DATE</b> September 20, 2021

<sup>1)</sup> See Federal rules of Criminal Procedure Rules 3, 4.1, and 54